



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278*

June 5, 2024

BY EMAIL AND ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Raheem Jones*, 15 Cr. 276 (PAE)

Dear Judge Engelmayer,

The parties write jointly in advance of the conference scheduled for Tuesday, June 11, 2024, at 12:00 p.m. in the above-referenced case. The defendant, who has been in state custody awaiting trial on charges of murder in the second degree and criminal possession of a weapon in the second degree,¹ recently pleaded guilty in New York Supreme Court in connection with a pretrial resolution agreed to with the Manhattan District Attorney's Office. The defendant pleaded guilty to manslaughter in the first degree, in violation of NYPL § 125.20(1).

The Government understands from Assistant District Attorney Kathleen Coulson, who is handling the state prosecution, that the defendant is scheduled to be sentenced on July 18, 2024, and that the agreed upon sentence is 16 years' imprisonment followed by five years of post-release supervision. Ms. Coulson requested that the parties to this violation proceeding request an adjournment to a date after the defendant's state sentencing to avoid the need to transfer the defendant back and forth from state and federal custody, and the expenditure of limited resources involved in doing so.

The Government understands from Probation that Probation anticipates filing an amended violation report shortly, including the offense to which the defendant pleaded guilty, which constitutes a violation of the terms of his supervised release. In addition, the Government understands from defense counsel that counsel anticipates that the defendant will be prepared to admit to the new specification in an amended violation report, once filed, at the next conference and proceed to sentencing.

Accordingly, the parties request an adjournment to a date in August 2024 to allow the defendant's state sentencing to proceed, to allow Probation to file an amended report, and to allow

¹ The conduct underlying one of the counts of criminal possession of a weapon in the second degree also gave rise to the violation of supervised release pending before this Court.

the parties to prepare for a change of plea and sentencing in this violation of supervised release proceeding.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

by: 

Lisa Daniels
Assistant United States Attorney
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cc: Defense Counsel (by ECF)
Probation (by email)

GRANTED. The conference previously scheduled for June 11, 2024 at 12:00 pm is adjourned to August 13, 2024 at 12:00 pm.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Dated: June 6, 2024